EXHIBIT 141

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228 (NGG) (JO)

JOINT DECLARATION OF JOHN P. PELISSERO AND MARGARET FAUT CALLAHAN

We, John Pelissero and Margaret Callahan, pursuant to 28 U.S.C. § 1746(2), subject to the penalty of perjury, declare as follows:

- 1. The undersigned both have personal knowledge of the facts set forth herein and are competent to testify to those facts. They make this joint declaration in their official capacities as provosts for Loyola University of Chicago.
- 2. John P. Pelissero, PhD, is provost and a professor of political science at Loyola University of Chicago, where he has served as a member of the faculty for over 30 years. He holds a BA in political science earned from Marquette University in 1975; Masters' degrees in political science and Public Administration from the University of Oklahoma; and a PhD in political science from the University of Oklahoma in 1983. Dr. Pelissero's University leadership roles began in 2003 with his appointment as the first associate provost for curriculum development. From 2005–10 he was vice provost for the Division of Academic Affairs, responsible for budgeting, enrollment management, faculty development, and institutional research. He was named provost in May 2010, and served in the position until July 2015 when he was appointed interim president of the University. In August 2016, he resumed his role as provost. As the University's chief academic officer, he leads academic affairs, including two colleges, seven schools, two institutes, the University Centers of Excellence, and University Libraries. He is a member of the President's Cabinet and is responsible for enrollment management and strategic planning.
- 3. Margaret Faut Callahan, CRNA, PhD, FNAP, FAAN, is provost of the Loyola University of Chicago Health Sciences Division and a member of the President's Cabinet. She leads all

academic initiatives in the division, which includes the Stritch School of Medicine, Marcella Niehoff School of Nursing, and the Graduate School's biomedical programs. She received her Bachelor of Science in Nursing from Loyola and has more than 35 years of experience in health care and higher education. Before coming to the University, she served as interim provost at Marquette University and dean and professor of the University's College of Nursing. She holds a Master of Science in Nursing and a Doctor of Philosophy in Nursing Science from Rush University College of Nursing, and she is a Fellow of both the American Academy of Nursing and the National Academies of Practice.

- 4. Loyola University of Chicago is a private institution, founded in 1870 and sponsored by the Society of Jesus (the Jesuits), serving approximately 16,700 graduate and undergraduate students. Its mission is grounded in the school's Ignatian heritage of faith, encompassing a profound commitment to the poor and to issues of social responsibility and justice. As stated in the school's Mission and Identity statement, one of the central characteristics of a Jesuit education is the "commitment to service that promotes justice: using learning and leadership in openhanded and generous ways to ensure freedom of inquiry, the pursuit of truth and care for others."
- 5. The admission and enrollment of DACA students is fully consistent with the Jesuit and Catholic values that permeate the institution of Loyola University of Chicago. As a Catholic university, we firmly believe in the dignity of each person and in the promotion of social justice. The dignity or worth of persons calls us to steward the talents of qualified applicants rather than reject their contributions for arbitrary and arcane reasons. Social justice requires that we foster the conditions for full participation in the community by all members of our community. Our

approach echoes a long tradition articulated by the U.S. Conference of Catholic Bishops of advocacy for immigrant members of our communities.

- 6. Consistent with its mission and its Ignatian heritage, Loyola University of Chicago has proudly welcomed DACA students through its doors since soon after the DACA program was initiated in 2012. Loyola does not require students to self-identify as DACA recipients; nonetheless, the University has welcomed DACA students throughout its three Chicago-area campuses:
 - a. Beginning in 2013, Loyola's Stritch School of Medicine was the first medical school nationwide to openly accept students with DACA status. The school aggressively supported the creation of a loan program through the Illinois Finance Authority, offering interest-free loans to Stritch students in return for a promise to pay back the principal and work for four years in an underserved Illinois community following graduation. The first DACA students to enroll at Stritch are currently in their fourth and final year of medical school, and additional DACA students are included in each of the medical school's current classes.
 - b. In the summer of 2014, the Student Government of Loyola Chicago partnered with the Latin American Student Organization to open up a scholarship fund for undocumented Loyola undergraduate students who demonstrate financial need but do not qualify for federal financial aid. Arising from this effort, the University began offering scholarship support to DACA students in the fall of 2014. The following year, the Loyola undergraduate student body voted to support a \$2.50 contribution from each student to support the Magis Scholarship fund, and in December of 2015, the University's Board of Trustees unanimously approved the students' vote to add an individual \$2.50 student

fee each semester. In addition, through a separate program now known as the Dreamer Scholarship, beginning in 2015 the University began offering full-scholarship awards to a number of DACA students in each entering class. Through both of these undertakings, Loyola University of Chicago now provides financial support for a significant number of DACA students who would otherwise be unable to attend the school.

- c. In 2015, Loyola enrolled its first class of students at Arrupe College, a newlyestablished two-year junior college program. Arrupe College seeks to serve nontraditional college students with limited financial means. Many of Arrupe's students are
 first-generation college attendees, and many of them come from immigrant
 communities in and around the Chicago area. Like its main undergraduate campus,
 Loyola's Arrupe College has welcomed DACA students, whose presence advances the
 University's goal of creating a broad and diverse community that will enhance the
 educational experience of all Loyola students. At present, Arrupe College has enrolled
 a significant number of students who have identified themselves as having DACA
 status, as well as an unknown number of other DACA recipients who have not
 identified themselves to the University.
- 7. The DACA program has provided important benefits to the students, faculty and staff of Loyola University. All of the individuals with DACA status studying throughout Loyola have confronted extraordinary challenges just to arrive at our doors, and a good number of them are the first in their families to attend college. They are woven into the fabric of our communities and have made important contributions both in and out of our classrooms. Their presence enriches the educational and cultural experiences of all of our students, contributing to a more

diverse and robust academic climate on all of our campuses and in all of our programs. They are our future doctors, lawyers, nurses, teachers, business owners, and leaders who join us in lifting up the most marginalized in our world. Loyola University of Chicago is committed to their success.

8. If the DACA program is discontinued, many students will have an understandable fear that they may be deported, a circumstance likely to interfere with their ability to thrive in a challenging academic environment and make meaningful contributions to our community. Beyond this, many of them will likely not be able to continue with their studies at Loyola. They will lose their ability to work legally, and therefore lose the ability to support themselves while studying. Ending the program will also adversely impact current students' ability to make important future contributions to the welfare of the State of Illinois. For example, the students with DACA status who will graduate with medical degrees this year may be unable to continue their training at the residency level and may be unable to fulfill their obligations to serve underserved patients in the state of Illinois. Additionally, they may have no ability to service their loan burdens and will thus be at risk of defaulting on their obligations to the state of Illinois. All of this will cause substantial and irreparable harm not only to our DACA recipients and their families, but also to all of the constituents of Loyola University of Chicago, including students, faculty and staff. It defies understanding that we as a country would squander the wealth of talent, commitment, and grit exhibited by this extraordinary group of people who we know as our colleagues, our classmates, and our neighbors.

The undersigned declare under penalty of perjury that to the best of their knowledge, the foregoing is true and correct.

Executed this 2174 day of September, 2017.

John P. Pelissero

Margaret Faut Callahan

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